# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

NETLIST, INC.,	
Plaintiff,	)
	) Case No. 2:22-cv-203-JRG
VS.	
	) JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON	N)
SEMICONDUCTOR PRODUCTS, INC.;	
MICRON TECHNOLOGY TEXAS LLC,	
	)
Defendants.	)
	)

#### JOINT MOTION FOR ENTRY OF ESI ORDER

Plaintiff Netlist, Inc. ("Netlist") and Defendants Micron Technology, Inc.; Micron Semiconductor Products, Inc.; and Micron Technology Texas LLC (collectively "Micron") (collectively "the Parties") respectfully file this Joint Motion for Entry of ESI Order. Netlist and Micron stipulate to the entry of the ESI Order filed concurrently herewith, and respectfully request that the Court enter it to facilitate discovery in this Action.

Dated: March 17, 2023 Respectfully submitted,

/s/ Thomas C. Werner

Jason Sheasby (pro hac vice) jsheasby@irell.com
H. Annita Zhong, PhD (pro hac vice) jsheasby@irell.com
Thomas C. Werner (pro hac vice) twerner@irell.com
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel. (310) 277-1010

Fax (310) 203-7199

Samuel F. Baxter Texas State Bar No. 01938000 sbaxter@mckoolsmith.com Jennifer L. Truelove Texas State Bar No. 24012906 jtruelove@mckoolsmith.com

MCKOOL SMITH, P.C.

104 East Houston Street Suite 300

Marshall, TX 75670

Telephone: (903) 923-9000 Facsimile: (903) 923-9099

## Attorneys for Plaintiff Netlist, Inc.

### /s/ Michael R. Rueckheim

Dated: March 17, 2023

Thomas M. Melsheimer State Bar No. 13922550 TMelsheimer@winston.com Natalie Arbaugh State Bar No. 24033378 NArbaugh@winston.com Barry K. Shelton State Bar No. 24055029 BShelton@winston.com WINSTON & STRAWN LLP 2121 N. Pearl Street, Suite 900 Dallas, TX 75201

Telephone: (214) 453-6500 Facsimile: (214) 453-6400

Michael R. Rueckheim State Bar No. 24081129 MRueckheim@winston.com WINSTON & STRAWN LLP 255 Shoreline Drive, Suite 520 Redwood City, CA 94065 Telephone: (650) 858-6500 Facsimile: (650) 858-6559

Matthew Hopkins Pro Hac Vice State Bar No. 1500598 MHopkins@winston.com WINSTON & STRAWN LLP 1901 L Street, N.W. Washington, D.C. 20036-3506 Telephone: (202) 282-5000

Facsimile: (202) 282-5100

Juan C. Yaquian
Pro Hac Vice
State Bar No. 24110559
JYaquian@winston.com
WINSTON & STRAWN LLP
800 Capital Street, Suite 2400
Houston, TX 77002-2925
Telephone: (713) 651-2600
Facsimile: (713) 651-2700

Wesley Hill State Bar No. 24032294 Andrea Fair State Bar No. 24078488 Charles Everingham IV State Bar No. 00787447 WARD, SMITH & HILL, PLLC P.O. Box 1231 Longview, Texas 75606-1231 Telephone: (903) 757-6400 Facsimile: (903) 757-2323

Facsimile: (903) 757-232 Email: wh@wsfirm.com andrea@wsfirm.com ce@wsfirm.com

Attorneys for Defendants Micron Technology, Inc.; Micron Semiconductor Products, Inc.; and Micron Technology Texas LLC

## **CERTIFICATE OF CONFERENCE**

I hereby certify that counsel have complied with the meet and confer requirement in Local Rule CV-7(h) and this Court's Orders and that all parties join in this motion.

/s/ *Thomas C. Werner* Thomas C. Werner

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served March 17, 2023 on all counsel who have consented to electronic service.

<u>/s/ Thomas C. Werner</u> Thomas C. Werner